



May 24, 2019

Michael J. Wilhelm
Chief, Policy and Licensing Division
Public Safety and Homeland Security Bureau
Federal Communications Commission (FCC)
445-12th Street, SW
Washington, D.C. 20554

Dear Mr. Wilhelm,

Subject: State of California application for FCC Rule Waiver

The California Governor's Office of Emergency Services (Cal OES) is requesting an FCC Rule Waiver for an exemption from 47 CFR, Part 10 and 47 CFR, Part 11 rules (Waiver). We are seeking the Waiver to allow the execution of a special test of the Wireless Emergency Alert (WEA) System to transmit earthquake early warnings. The California Emergency Services Act designates Cal OES as the statewide alert and warning authority. Cal OES will work collaboratively with the San Diego County Office of Emergency Services (San Diego County OES) and the United States Geological Survey (USGS) to administer the test. The geographic area of the test will be within San Diego County.

Building off of our first test conducted in Oakland on March 27, 2019, this test will assess the feasibility of using the Integrated Public Alert and Warning System (IPAWS) WEA alert system on a countywide basis to warn the public of imminent ground motion during an earthquake. This is the second in a series of progressive tests in which we are attempting to collect data in a consistent manner to aid in our decision making process of the feasibility of using WEA with our Earthquake Early Warning System. Earthquake Early Warning requires notifications to be distributed within seconds of generation to allow people to take protective actions. This test will provide critical findings that may be used to refine earthquake early warning integration with IPAWS.

This test will occur between 11:00am and 12:00pm Pacific Standard Time on Thursday, June 27, 2019. If this date is not available, an alternative testing date would be



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Thursday, July 12, 2019. There is up to a 99 percent probability that a magnitude 6.7 or higher earthquake will occur within the state anytime within the next 30 years. A report published by the Earthquake Engineering Research Institute found that the Rose Canyon fault in San Diego could produce a magnitude 6.9 earthquake, which would result in over 2,000 lives lost and thousands more injured. Effective alerts and warnings are a critical emergency management tool to help prevent hazards from becoming disasters by empowering citizens to make informed decisions and take action to save lives and reduce property losses, enabling quicker recovery. Without this waiver, critical live testing cannot be conducted to evaluate the current capability of end-to-end earthquake early warning transmissions over WEA.

The text of the test will read: "TEST of the CA Earthquake Warning System. No action required. THIS IS A TEST."

As part of this test, Cal OES and San Diego County OES will complete an outreach campaign within the participating region. The campaign includes the following elements:

1. Cal OES will conduct a conference call with members of the Cellular Telecommunications Industry Association to discuss the nature of the test, coordinate actions with wireless providers to administer the test, and gather input to improve the test design.
2. Cal OES and San Diego County OES will conduct regional conference calls with, and distribute educational materials to, emergency managers in the test area to ensure that they have the information necessary to inform first responders and public safety answering points to confirm that the activity is only a test.
3. Cal OES and San Diego County OES will conduct a stakeholder call with local, state, federal, and private partners in San Diego to announce the test, communicate information, answer questions, facilitate local participation, and solicit feedback.
4. Cal OES and San Diego County OES will conduct a media campaign in the immediate and surrounding areas, which will include sending a press release, airing a public service announcement on the radio, conducting outreach to local broadcasters and newspapers, and posting pertinent information to websites and social media platforms.

Cal OES will provide the FCC with a detailed account of any problems that occur in the distribution of the WEA test message, in addition to a post-test analysis. If you have any questions, or wish to discuss further, please contact Ryan Arba, Branch Chief of the Cal OES Seismic Hazards Program, at ryan.arba@caloes.ca.gov or (916) 845-8132.

Thank you for your consideration.

Sincerely,



CHRISTINA CURRY
Deputy Director

cc: Dr. Stephen Hickman, Director, Earthquake Science Center, USGS
Robert Fenton, Regional Administrator, Federal Emergency Management Agency
Region IX
Holly Porter, Director, San Diego County OES